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FARRA FOXDOG PRODUCTIONS, LLC

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

LEVY PRODUCTION GROUP, LLC, a
Nevada limited liability company,

Plaintiff,

v.

R&R PARTNERS, INC., a Nevada
corporation; FARRA FOXDOG
PRODUCTIONS, LLC; ROE
CORPORATIONS 1-10; JOHN DOES 11-20,

Defendants.

Case No.: 2:22-cv-01261-JAD-DJA

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND DISCOVERY
DEADLINES**

(SECOND REQUEST)

Pursuant to Local Rules IA 6-1, LR 7-1 and 26-3, plaintiff Levy Production Group, LLC (“Plaintiff”) and defendants R&R Partners, Inc, (“R&R”) and Farra Foxdog Productions, LLC (“Farra Foxdog”) (together, “Defendants”) stipulate to extend the discovery deadlines set forth in the Stipulated Discovery Plan and Scheduling Order (ECF No. 21). The parties’ stipulation is supported by the following:

I. Discovery Completed to Date.

The parties have completed the following discovery:

- Plaintiff served its initial disclosures under Rule 26(a)(1) on March 3, 2023.
- Plaintiff served its initial document production on March 3, 2023.
- The parties held their Rule 26(f) conference on March 9, 2023.
- R&R served its initial disclosures under Rule 26(a)(1) on March 23, 2023.
- Farra Foxdog served its initial disclosures under Rule 26(a)(1) on April 3, 2023.
- Farra Foxdog served its initial document production on April 3, 2023.
- Plaintiff served its first set of Requests for Production to R&R on March 31, 2023.
- Plaintiff served its first set of Requests for Production to Farra Foxdog on March 31, 2023.
- R&R served its first set of Requests for Production and first set of Interrogatories to Plaintiff on April 4, 2023.
- Farra Foxdog responded to Plaintiff’s first set of Requests for Production and supplemented its document production on April 26, 2023.
- R&R responded to Plaintiff’s first set of Requests for Production on May 1, 2023.
- R&R served its initial document production on July 3, 2023.
- Plaintiff took the deposition of former employee of Defendant R&R Partners/non-party Stanzie Dunn on July 28, 2023.
- Plaintiff served its second set of Requests for Production to R&R on August 2, 2023.
- Plaintiff took the deposition of current employee of Defendant R&R Partners/non-party Don Turley on August 11, 2023.
- R&R responded to Plaintiff’s second set of Requests for Production on September 1, 2023.
- R&R produced additional, requested documents on September 14, 2023.

1 **II. Discovery that Remains to be Completed.**

2 Plaintiff intends to take the depositions of the following fact witnesses:

- 3 • Yanick Dalhouse;
- 4 • Vaitari Anderson;
- 5 • Dennis Caldwell;
- 6 • Danita Collazo;
- 7 • Gina Nelson;
- 8 • Defendant R&R Partners, Inc.'s 30(b)(6) representatives;
- 9 • David Farra;
- 10 • James Farra;
- 11 • Matt Brown; and
- 12 • Las Vegas Convention and Visitors Authority 30(b)(6) representatives.

13 Nothing herein shall constitute a waiver by Defendants of the 10-deposition limit set forth
14 under Fed. R. Civ. P. 30(a)(2).

15 Defendants intend to take the depositions of the following fact witnesses:

- 16 • Mike Levy;
- 17 • Jacquie Gray; and
- 18 • Plaintiff's 30(b)(6) witness(es).

19 The parties further anticipate the need to depose each parties' respective expert witnesses.

20 The parties reserve the right to seek additional discovery.

21 **III. Reasons for Extension.**

22 Good cause supports the requested extension. The parties have been working diligently
23 to complete discovery and take depositions before the current deadline. However, due to
24 Plaintiff's attorney's hospitalization and illness lasting several weeks during a time when several
25 important depositions had been set, and other unforeseeable events, including various scheduling
26 conflicts with witnesses, several depositions that the parties expected to occur in late September
27 and through October needed to be continued to November 2023 and onward. Rather than waiting
28 until the cusp of the current deadlines before requesting a revision of the case management order,

the parties now jointly seek to extend the deadline for the close of discovery by approximately 60 days, from February 5, 2024, to April 8, 2024, and to adjust all case deadlines accordingly. This request is made in good faith and not for purposes of delay, and the parties believe that the additional time will result in a narrowing of the issues and reducing the time required for trial.

IV. Proposed Schedule for Completing all Remaining Discovery.

The parties propose the following extensions of deadlines:

Event	Current Date	Parties' Stipulated Proposal
Discovery cutoff	February 5, 2024	April 8, 2024
Deadline for amending pleadings/adding parties	August 30, 2023	<i>No Change</i>
Expert disclosures	December 8, 2023	February 9, 2024
Rebuttal expert disclosure	January 5, 2024	March 8, 2024
Dispositive motion deadline	March 11, 2024	May 14, 2024
Joint pretrial order	April 10, 2024	June 12, 2024

IT IS SO AGREED AND STIPULATED

Dated this 16th day of October 2023.

/s/ Bradley L. Booke

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Attorneys for Defendant
R&R PARTNERS, INC.

1 **IT IS SO ORDERED** that the parties' stipulation to extend discovery deadlines
2 (ECF No. 29) is GRANTED.

3 DATED: 10/17/2023

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5 DANIEL J. ALBREGTS
6 UNITED STATES MAGISTRATE JUDGE
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